

# **Exhibit A**



# New York State Unified Court System

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## EF2023-0220 - Tompkins County Supreme Court

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Short Caption: **Luciano J Lama v. Meta Platforms, Inc. et al**  
Case Type: **Torts - Product Liability (OBO Minor)**  
Case Status: **Active**  
eFiling Status: **[Partial Participation Recorded](#)**  
Assigned Judge: **Mark G Masler**



**Maureen Reynolds**  
Tompkins County Clerk  
[mreynolds@tompkins-co.org](mailto:mreynolds@tompkins-co.org)

**Tompkins County Clerk's Office**  
320 North Tioga St  
Ithaca, NY 14850  
Phone: 607.274.5432  
Fax: 607.274.5445  
<http://www.tompkinscountyny.gov/cclerk>

**Rachel Graham**  
Deputy County Clerk  
[rgraham@tompkins-co.org](mailto:rgraham@tompkins-co.org)

**E-Filing Resources**  
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### Document List

### Case Detail

#### Narrow By Options

Document Type:

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Motion Info:

Filed Date:  thru

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#	Document	Filed By	Status
1	<a href="#">SUMMONS</a>	Lama, L. Filed: 04/05/2023 Received: 04/05/2023	<b>Processed</b> <a href="#">Confirmation Notice</a>
2	<a href="#">COMPLAINT</a>	Lama, L. Filed: 04/05/2023 Received: 04/05/2023	<b>Processed</b> <a href="#">Confirmation Notice</a>
3	<a href="#">ORDER TO SHOW CAUSE - ACCOMPANYING COMMENCEMENT DOC(S) (PROPOSED)</a> (Motion #1)	Lama, L. Filed: 04/05/2023 Received: 04/05/2023	<b>Processed</b> <a href="#">Confirmation Notice</a>
4	<a href="#">AFFIRMATION</a>	Lama, L. Filed: 04/05/2023 Received: 04/05/2023	<b>Processed</b> <a href="#">Confirmation Notice</a>
5	<a href="#">RJI -RE: OTHER TRO</a>	Lama, L. Filed: 04/05/2023 Received: 04/05/2023	<b>Processed</b> <a href="#">Confirmation Notice</a>
6	<a href="#">ASSIGNED RJI</a>	Court User Filed: 04/06/2023 Received: 04/06/2023	<b>Processed</b> <a href="#">Confirmation Notice</a>
7	<a href="#">LETTER/CORRESPONDENCE FROM COURT</a> (Motion #1)	Court User	<b>Processed</b>

Application for FRO will be heard 4/16/23 at 4:00 p.m. via Microsoft Teams  
Filed: 04/07/2023  
Received: 04/07/2023  
[Confirmation Notice](#)

NYSCEF E-mail: [nyscef@nycourts.gov](mailto:nyscef@nycourts.gov) Phone: (646) 386-3033 Fax: (212) 401-9146

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  - [FAQs](#)
  - [Remove Attorney Representation](#)
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CI2023-07009

Index # : EF2023-0220

STATE OF NEW YORK  
SUPREME COURT: COUNTY OF TOMPKINS

---

Luciano J. Lama,  
as Attorney,  
On Behalf Of, L.D.L, An Infant,

Plaintiff,

vs.

**SUMMONS**

Index No. \_\_\_\_\_

R.J.I. No. \_\_\_\_\_

Meta Platforms, Inc. and  
Instagram, Inc.,

Defendants.

---

*To the above-named Defendants :*

**You are hereby summoned** to answer the complaint in this action and to serve a copy of your answer, or if the Complaint is not served with this Summons, to serve a Notice of Appearance on Plaintiff's attorney within twenty days after service of this Summons, exclusive of the day of service, or within thirty days after service is complete if this Summons is not personally delivered to you within the State of New York. In case of your failure to appear or answer, judgment will be taken against you for the relief demanded in the Complaint.

The basis of venue designated is the residence of the plaintiff in the County of Tompkins, State of New York.

Dated: April 5, 2023  
Ithaca, New York



Ciano J. Lama, Esq.  
The Lama Law Firm, LLP  
Attorney for Plaintiff  
2343 N. Triphammer Road  
Ithaca, NY 14850  
Phone: (607) 275-3425  
e-mail: ciano@lamalaw.com

STATE OF NEW YORK  
SUPREME COURT: COUNTY OF TOMPKINS

---

Luciano J. Lama, as  
Attorney, On Behalf Of,  
L.D.L, AN INFANT,

Plaintiff,

COMPLAINT

Index No. \_\_\_\_\_

R.J.I. No. \_\_\_\_\_

vs.

Meta Platforms, Inc. and  
Instagram, Inc.,

Defendants.

---

Plaintiff alleges the following in support of his complaint against defendants  
Meta Platforms, Inc and Instagram Inc.:

**PARTIES**

1. Plaintiff, John Doe (hereinafter plaintiff) was at all times relevant hereto a resident of the Town of Lansing, County of Tompkins, State of New York and a minor.
2. This action is brought upon his behalf and for his protection.
3. Defendant Meta Platforms, Inc., formerly known as Facebook, Inc., (hereinafter Defendant Meta) is a Delaware corporation with its principal place of business in Menlo Park, CA. Defendant Meta Platforms owns and operates Instagram Inc., which owns and operates the Instagram social media platform, an application that is widely available to users throughout the United States and New York State.
4. Defendant Meta maintains offices and does business in person at 770

CI2023-07010

Index #: EF2023-0220

Broadway, New York, New York, 10003.

5. Defendant, Instagram, Inc. (hereinafter defendant Instagram) is headquartered at Menlo Park, 1 Hacker Way, United States, and has 7 office locations, including an office located at 770 Broadway, New York, New York, 10003.

**COUNT I: PRODUCTS**  
**LIABILITY**

6. Plaintiff restates and re-alleges paragraphs 1-5 as if fully set forth herein and further alleges that:

7. The defendants, have been, engaged in the business of the manufacture, production, and sale, license, lease, and otherwise grant use, of social media apps to ultimate consumers such as the plaintiff and did, in fact, produce, manufacture, production, and sale, license, lease, and otherwise grant use of the app known as Instagram to the plaintiff and other children at his school.

8. Defendants were careless in the design, testing, inspection, manufacture, distribution, labeling, sale and promotion of said app.

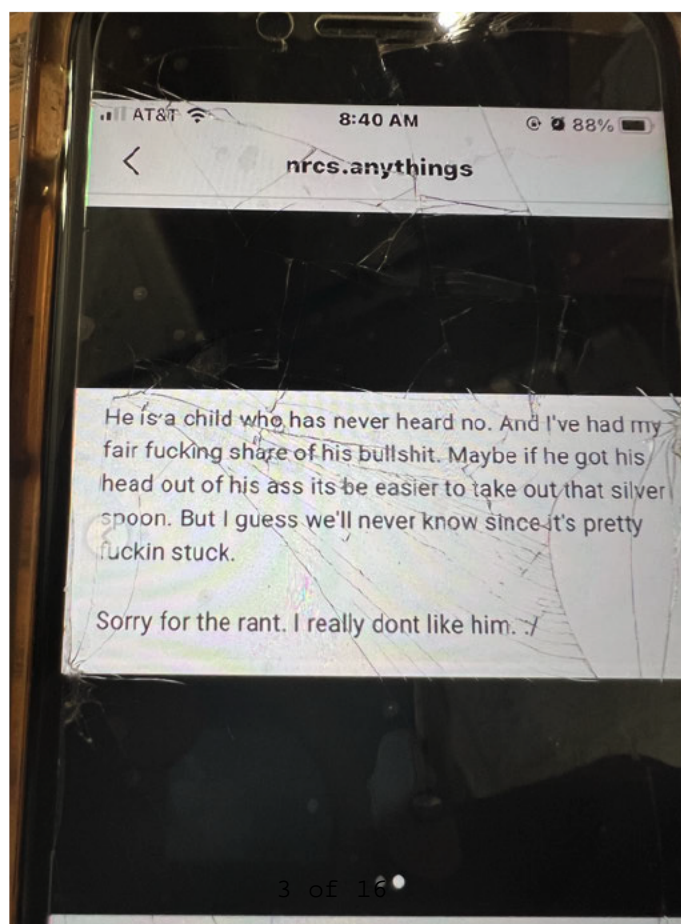
9. As a direct and foreseeable result thereof, said app is routinely weaponized by children to bully, harass, annoy, alarm, menace, and otherwise bully other children in the plaintiff's school.

10. More specifically, on or about March 29, 2023, school personnel notified the defendants that the app was being weaponized as such and harming children at the school.

CI2023-07010

Index #: EF2023-0220

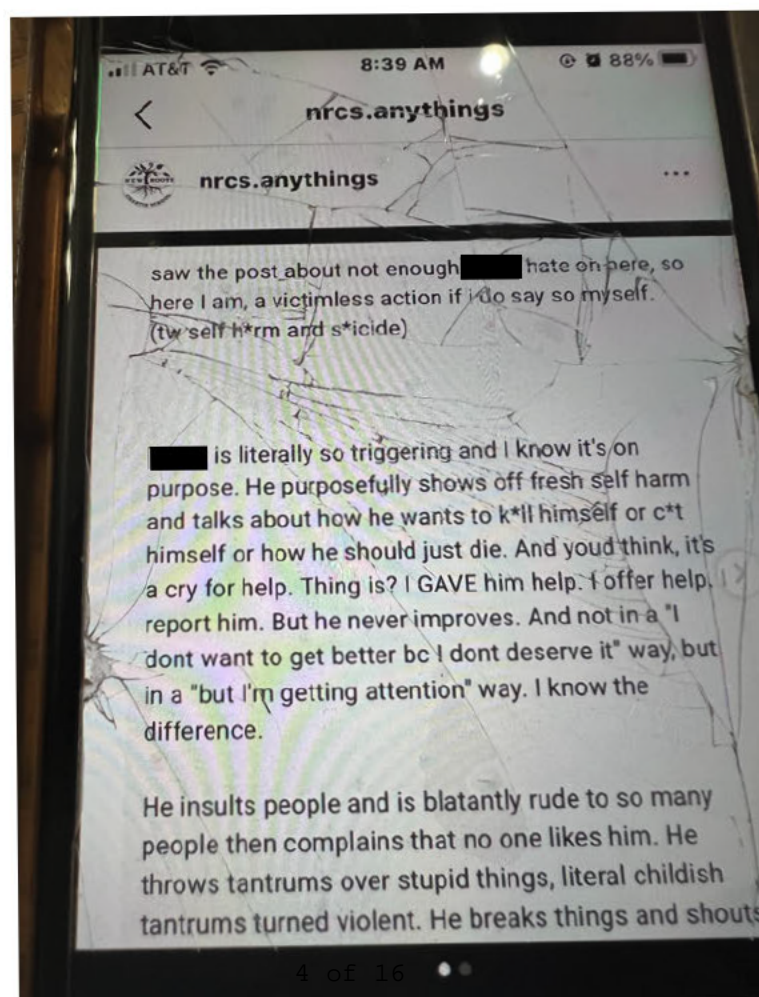
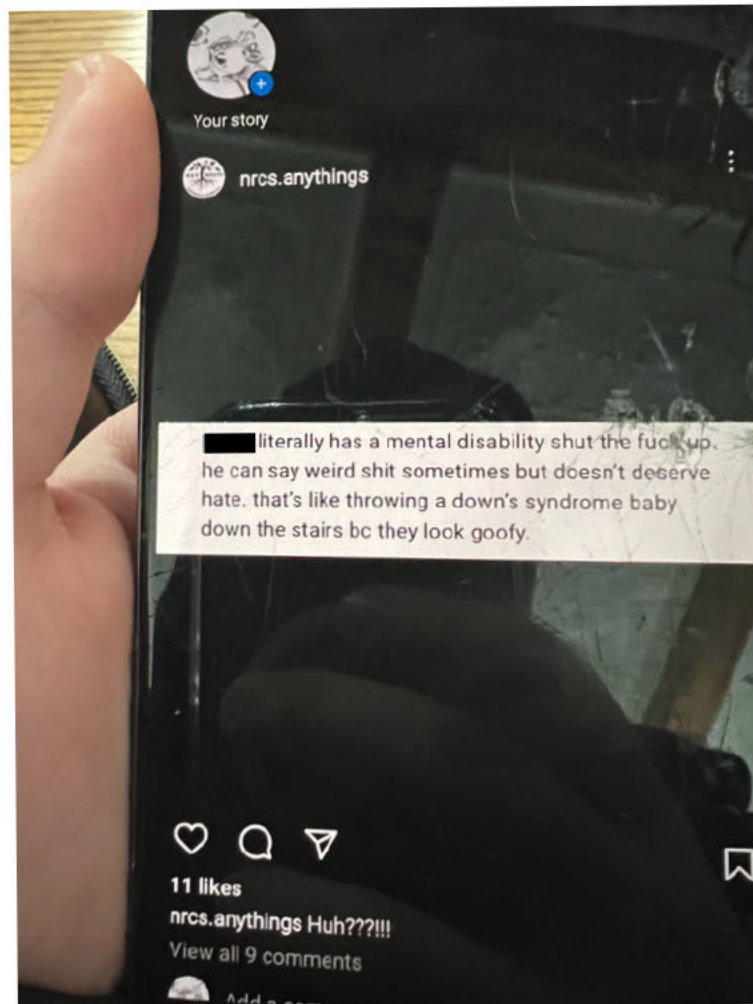
11. School personnel utilized the app's defective policies and procedures to request, in a fashion tantamount to writing, that the defendants remove the Instagram account known as "nracs.anythings," which was being used specifically and maliciously harm children at the school in violation thereof.
12. Defendants had actual knowledge of the same as of that date.
13. Defendants failed to remove the said account.
14. Children continued to misuse the said app to harm and injure each other.
15. On April 4, 2023, children used the said app in a fashion that injured the plaintiff.
16. On April 4, 2023, children used the said app in a discriminatory fashion causing injury to the plaintiff.
17. More specifically, children brandished to the plaintiff in person the following hateful and bullying conduct using said app:





CI2023-07010

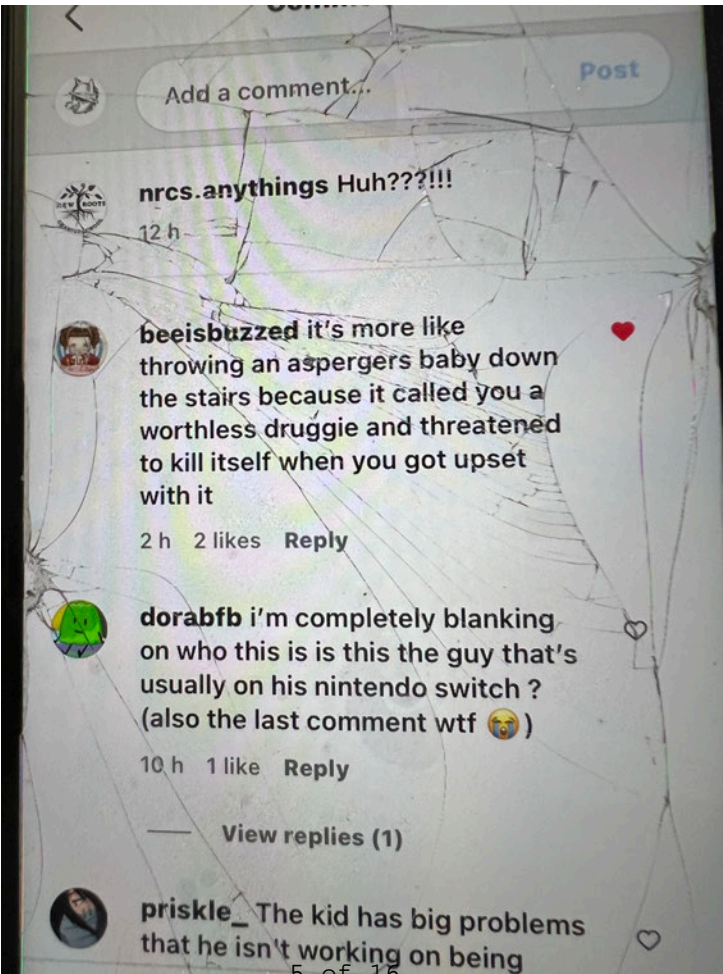
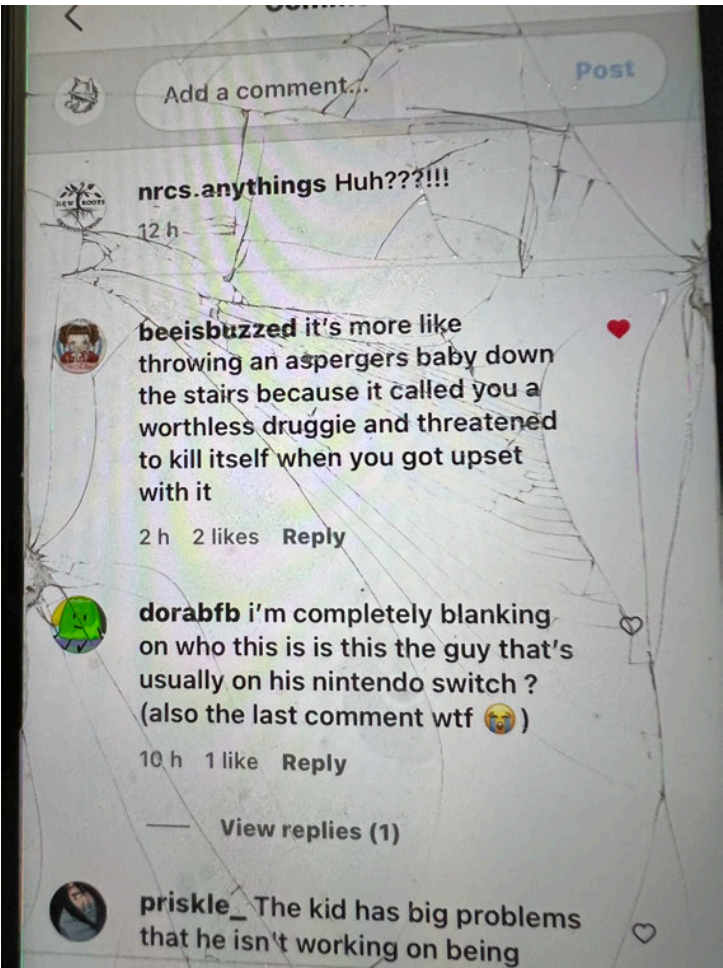
Index #: EF2023-0220





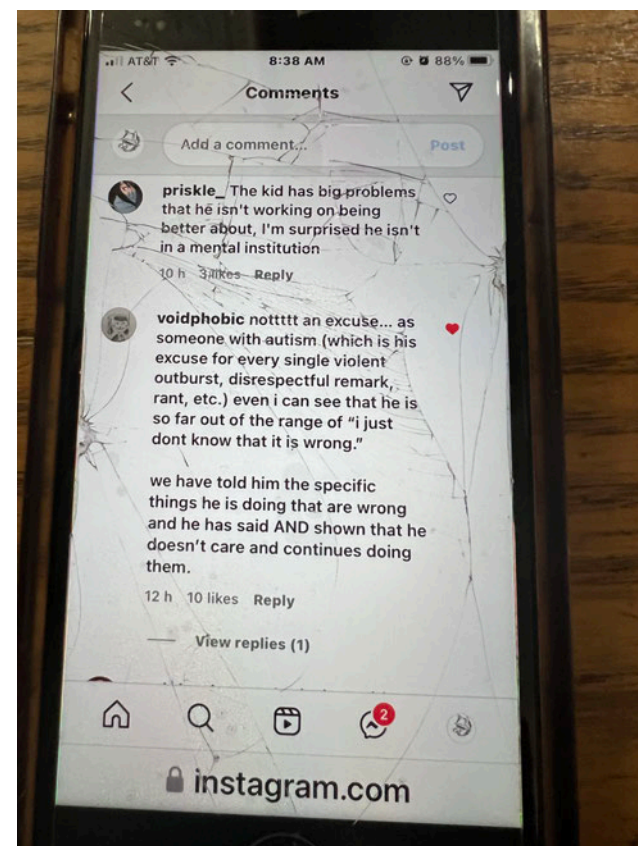
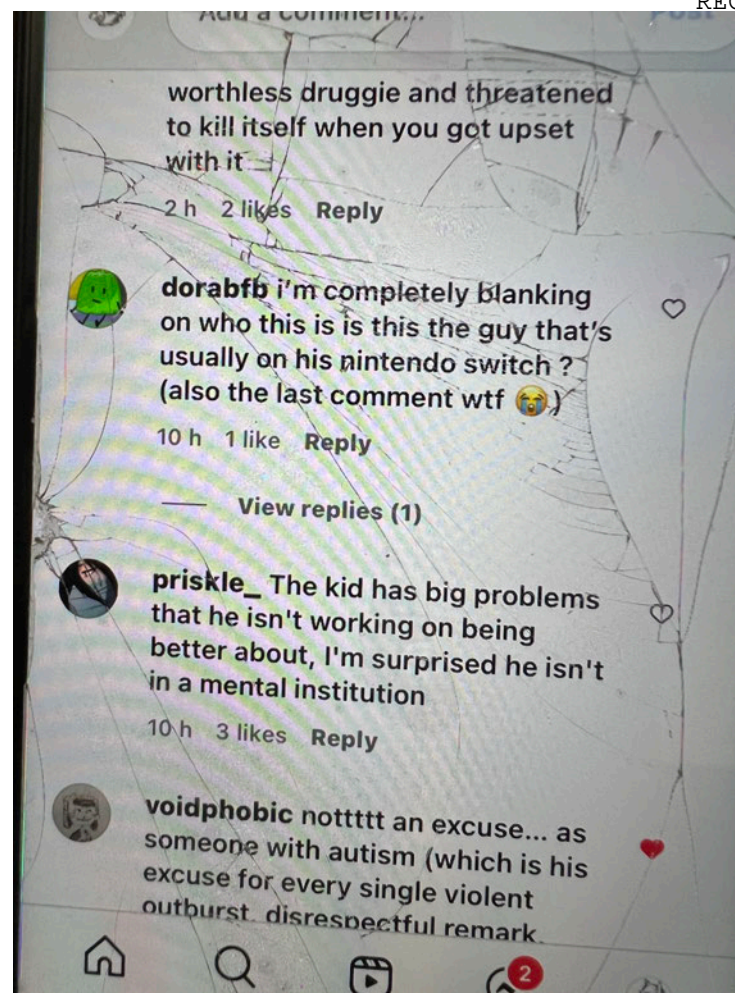
CI2023-07010

Index #: EF2023-0220



CI2023-07010

Index #: EF2023-0220



CI2023-07010

Index #: EF2023-0220

18. Said use of the app inflicted serious and painful injuries upon the plaintiff as hereinafter more fully set forth herein.

19. The injuries were caused by the negligence of the defendants, which negligence consisted, among other things, of the following:

- (a) in selling and permitting to be sold and distributed an app with an absence of or defective child protections, with the result that children were harmed thereby and that on April 4, 2023, the plaintiff suffered injuries as set forth herein;
- (b) in failing to use due care in the design, production, coding, and manufacture of the app;
- (c) in failing to conduct proper tests on the app before distributing it to the general public;
- (d) In failing to properly include within the app mechanisms by which school personnel, parents, guardians, and other persons responsible for children during are able to prevent the said app from being weaponized and otherwise used to harm other children in any fashion whatsoever; and
- (e) In failing to properly include within and/or within the app adequate warnings and instructions of any and all mechanisms by which school personnel, parents, guardians, and other persons responsible for children during are able to prevent the said app from being weaponized and otherwise used to



CI2023-07010

Index #: EF2023-0220

harm other children in any fashion whatsoever; and

(f) in failing to properly inspect the app before placing before distributing it to the general public;

(g) in permitting the app to be distributed with a defective user interface and mechanisms when defendants knew that an app with a defective user interface mechanisms constituted a dangerous instrumentality, especially when used by minors, whom the defendants also specifically and maliciously targeted as users thereof;

(h) in improperly constructing, coding, and installing mechanisms by which adults could remove dangerous and injurious accounts therefrom to protect children;

(i) in using defective designs, codes and the like in manufacturing the app;

(j) in failing to discover the aforesaid; and

(k) in being otherwise careless and negligent.

20. As a result of the thereof, due to the negligence of the defendants, the plaintiff sustained severe and painful injuries and shock, was rendered and continues to be sick, sore, lame, and disabled, and upon information and belief, plaintiff's injuries will be permanent.

21. Plaintiff has incurred and will incur in the future considerable expense for medical and care and treatment; and the plaintiff was prevented from attending school instruction for a period of time.

22. The aforesaid has interfered with the said plaintiff's education and

CI2023-07010

Index #: EF2023-0220

continues to interfere with the same.

23. The aforesaid has created a hostile environment obstructing and interfering with the plaintiff's education in the said school and continues to do the same.

24. By reason of the foregoing, the plaintiff has been damaged in an amount to be determined upon the trial of this action.

**COUNT III: STRICT PRODUCTS  
LIABILITY**

25. Plaintiff restates and re-alleges paragraphs 1-24 as if fully set forth herein and further alleges that:

26. At the time of the occurrences, the app was being used for the purpose and in the manner normally intended by the defendants.

27. That plaintiff and other children would not by the exercise of reasonable care have discovered the defect and perceived its danger created by the said app.

28. Plaintiff's exercise of reasonable care under the circumstances would not otherwise have averted the injury or damages.

29. The said defects of the app were a substantial factor in bringing about the injury or damage to the plaintiff.

**COUNT III: FRAUD &  
MISREPRESENTATION**

30. Plaintiff restates and re-alleges paragraphs 1-29 as if fully set forth herein and further alleges that:

CI2023-07010

Index #: EF2023-0220

31. At all times relevant herein, defendants provided statements to plaintiff, plaintiff's parents, and school personnel, which falsely asserted each and every statement contained in Exhibit A, annexed hereto and incorporated by reference.

32. Each and every statement contained in Exhibit A provided to plaintiff by defendants regarding said were false.

33. Defendant manifested an intent and scienter to defraud, mislead, and deceive, plaintiff and all those responsible for his care or otherwise wise in loco parentis all for defendants' profit and benefit.

34. Plaintiff and his caretakers relied upon defendants' aforementioned fraudulent, deceitful and misrepresented statements in their efforts to protect the plaintiff and other children by following the same and seeking correction of the aforesaid defects.

35. Defendants failed and otherwise refused to act.

36. Whereby plaintiff suffered and continues to suffer damages in an amount to be determined.

37. The amount of damages sought in this action exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

### **PRAYER**

**WHEREFORE**, Plaintiffs demands that judgment be entered against the defendants as follows:

1. Punitive damages in an amount sufficient to deter defendants from continuing said systematic and ongoing predatory conduct aimed at

CI2023-07010

Index #: EF2023-0220

- profiting from the exploitation of children through the use of its apps;
2. Judgment against defendants in an amount to be determined upon the trial of this action,
  3. An injunction shutting down the said app until said dangerous conditions are resolved,
  4. The costs of this action, and
  5. Any other legal or equitable relief to which Plaintiff may be entitled.

Dated: April 5, 2023  
Ithaca, New York



---

Ciano J. Lama, Esq.  
The Lama Law Firm, LLP  
Attorneys for the Plaintiff  
2343 North Triphammer Road  
Ithaca, New York 14850  
(607) 275-3425  
ciano@lamalaw.com



CI2023-07010

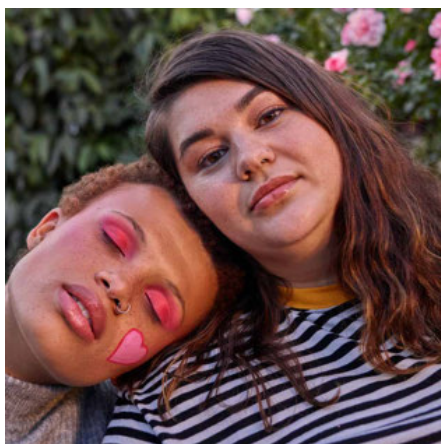
Index #: EF2023-0220



Exhibit A

ANTI-BULLYING

# Instagram stands against online bullying



TOOLS TO FIGHT BULLYING

We're committed to protecting you from bullying on Instagram. Learn more about the features and tools we've developed to keep you safe.

CI2023-07010

Index #: EF2023-0220

## Comment Warning

When someone tries to post a potentially offensive comment, we'll show a warning reminding them of our Community Guidelines and letting them know we may remove or hide their comment if they proceed.

## Tag and Mention Controls

You can choose whether you want everyone, only people you follow or no one to be able to tag or mention you in a comment, caption or Story.

## Report

If you see something that violates our Community Guidelines, **report it** so our team can review it and take action. People aren't notified when you report them.

## Block

When you **block someone**, they won't be able to see your profile, posts, or Stories on Instagram. People aren't notified when you block them. You can also proactively block new accounts that person might create.

## Hidden Words

Comments and Message Requests that don't go against our Community Guidelines, but may be considered inappropriate or offensive, can be filtered out. You can also create your own custom word list.

## Limits

**Limit** unwanted interactions for a period of time by automatically hiding comments and message requests from people who don't follow you, or who only recently followed you.

## Restrict

When you **Restrict** someone, their comments on your posts will only be visible to that person. You can choose to view the comment by tapping "See Comment";

CI2023-07010

Index #: EF2023-0220

approve the comment so everyone can see it; delete it; or ignore it. The restricted account will also not be able to see when you've read their DMs or when you are active on Instagram. People aren't notified when you restrict them.

It's our responsibility to foster a safe and supportive community for everyone.

CI2023-07010



Index #: EF2023-0220



SAFETY

PARENTS



Log in



Related articles

## Learn more about Safety at Instagram

#INSTAGRAM #ANNOUNCEMENTS #SAFETY

[Continuing to Keep Instagram Safe and Secure](#)



CI2023-07010

Index #: EF2023-0220

#CREATORS #INSTAGRAM #ANNOUNCEMENTS #SAFETY

## Updates to How We Protect Our Community from Abuse



#INSTAGRAM #ANNOUNCEMENTS #SAFETY

## Understanding How Different Communities Experience Instagram



### About Us

Careers  
Brand Assets

### Features

Reels  
Stories  
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Engineering  
Help ↗

English (US)

Instagram from Meta

API

Privacy

Terms

Sitemap

**STATE OF NEW YORK**  
**SUPREME COURT: COUNTY OF TOMPKINS**

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Luciano J. Lama,  
as Attorney,  
On Behalf Of, L.D.L, An Infant,

**ORDER TO SHOW  
CAUSE**

Plaintiff,

Index No.:

vs.

Meta Platforms, Inc. and  
Instagram, Inc.,

Defendants.

---

Upon the Complaint herein and the annexed affirmation of the attorney for the plaintiff, sworn to on April 5, 2020, Ciano J. Lama, Esq., and upon the exhibits annexed thereto, and upon all the pleadings and proceedings had herein, it is

**ORDERED** that the above named defendants, show cause before this Court at term to be held at the courthouse located at 320 North Tioga Street, Ithaca, New York, on \_\_\_\_\_, 2023 at \_\_\_\_\_m., or as soon thereafter as counsel can be heard, why an order should not be made and entered herein directing the defendants to permanently remove the account known as “nrcs.anythings” or the like, from the app and social media platform known as Instagram. In the meantime, pending the hearing and determination of this motion, and the further order of this Court, it is

**ORDERED** that the above named defendants shall remove from the social media platform the account known as Instagram, “nrcs.anythings” or the like immediately pending further order of this Court; and

Sufficient reason appearing therefor, let service of a copy of this **ORDER** and the papers upon which it is based, upon the respondent by \_\_\_\_\_, on or before \_\_\_\_\_, 2023 \_\_\_\_\_, be deemed good and sufficient service, and that answering affidavits, if any, be served at least \_\_\_\_\_ day(s) before the return date of this motion.

Dated: \_\_\_\_\_ Ithaca, New York

ENTER:

\_\_\_\_\_  
Hon.  
Supreme Court Justice

CI2023-07012

Index # : EF2023-0220

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF TOMPKINS**

\_\_\_\_\_  
Luciano J. Lama,  
as Attorney,  
On Behalf Of, L.D.L, An Infant,

**AFFIRMATION**

Plaintiff,

Index No.:

vs.

Meta Platforms, Inc. and  
Instagram, Inc.,

\_\_\_\_\_  
Defendants.

Ciano J. Lama, Esq., an attorney admitted to practice before the Courts of the State of New York and a partner with The Lama Law Firm, LLP, attorneys for the plaintiff, affirms the following under penalties of perjury pursuant to CPLR 2106.

1. I am a partner of The Lama Law Firm, LLP, attorneys for the plaintiff herein. I make this Affirmation in support of the within Order to Show Cause seeking a temporary order requiring the defendants to suspend or remove a dangerous account from the social media platform known as Instagram.
2. This Affirmation is made upon information and belief except as to those matters wherein it is stated that your affirmant has actual knowledge thereof, and is derived from the information provided by consultations with school personnel, and the plaintiff, as well as other apparently reliable sources.
3. I hereby incorporate by reference, as if fully set forth herein, the entirety of the complaint in this action.
4. On April 4, 2023 your affirmant learned that someone had set up an account

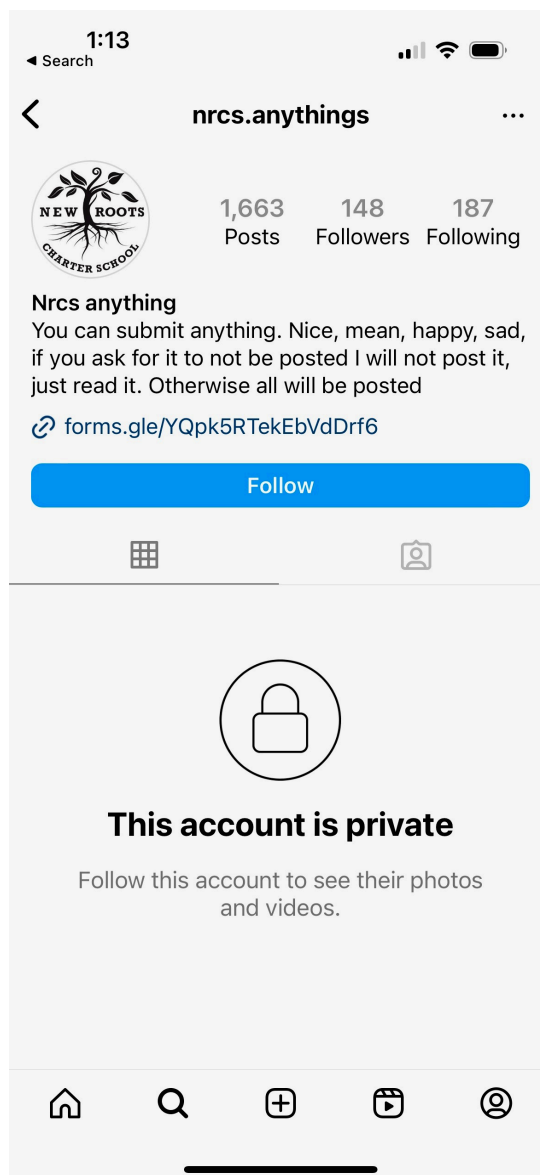


CI2023-07012

Index #: EF2023-0220

on instagram known as “nracs.anythings” and it had been used as a tool to harm children, including the plaintiff.

5. Upon further investigation, the account entices and invites children, in that, “You can submit anything. Nice, mean, happy, sad, if you ask for it to not be posted I will not post it, just read it. Otherwise all will be posted” See below



CI2023-07012

Index #: EF2023-0220

6. It was on this account where the injurious conduct set forth in the complaint was perpetrated against the plaintiff on April 4, 2023.

7. The plaintiff attends New Roots school in Ithaca.

8. It seems that account encourages and incites children to engage in harmful conduct in the name its self, to wit, “nr[new roots]say anything.”

9. Personnel at New Roots became aware of the account due to the disruption it was causing in school and had been trying to get the defendants to remove the account since at least March 29, 2023.

10. They followed the procedures and instructions set forth by the defendants to have the dangerous account removed.

11. The defendants did not remove the account.

12. Then on April 4, 2023 the said account was used to harm the plaintiff as more particularly set forth in the complaint herein.

13. The account is still active and upon information and belief being used to harm children at the school, including the plaintiff.

14. Plaintiff will likely succeed on the merits of his causes of action as set forth in the complaint.

15. Plaintiff (and other children) will suffer irreparable harm if the relief sought herein is not granted because without such an injunction the aforesaid injurious conduct will continue unabated to the plaintiff’s further serious injury.

16. Plaintiff (and other children) has suffered and will continue to suffer injury without injunctive relief.

CI2023-07012

Index #: EF2023-0220

17. The equities are balanced in favor of plaintiff and the relief sought herein.

18. The defendants will suffer no damage if the injunction is granted.

19. There will be no undue costs or impact on society or any innocent third parties if the injection is granted. To the contrary, the plaintiff and other children will be protected if it is granted.

20. Federal Law authorizes (and protects) the defendants to remove such accounts from its social media platforms.

Wherefore, your affirmant respectfully requests that the Court issue an injections mandating the defendants remove the said account pending further proceedings herein.

Dated: April 5, 2023  
Ithaca, New York

Respectfully Submitted,



Ciano J. Lama, Esq.  
The Lama Law Firm, LLP  
Attorneys for the Plaintiff  
2343 North Triphammer Road  
Ithaca, New York 14850  
(607) 275-3425  
ciano@lamalaw.com

**Index # : EF2023-0220**



Supreme COURT, COUNTY OF Tompkins

Index No: \_\_\_\_\_ Date Index Issued: \_\_\_\_\_

**For Court Use Only:**

<b>CAPTION</b>	Enter the complete case caption. Do not use et al or et ano. If more space is needed, attach a caption rider sheet.	IAS Entry Date
Luciano J Lama		
		Judge Assigned
	Plaintiff(s)/Petitioner(s)	
-against-		
Meta Platforms, Inc., Instagram, Inc.		RJI Filed Date
	Defendant(s)/Respondent(s)	

**NATURE OF ACTION OR PROCEEDING:** Check only one box and specify where indicated.

**COMMERCIAL**

- ☐ Business Entity (includes corporations, partnerships, LLCs, LLPs, etc.)
- ☐ Contract
- ☐ Insurance (where insurance company is a party, except arbitration)
- ☐ UCC (includes sales and negotiable instruments)
- ☐ Other Commercial (*specify*):

**NOTE:** For Commercial Division assignment requests pursuant to 22 NYCRR 202.70(d), complete and attach the **COMMERCIAL DIVISION RII ADDENDUM (UCS-840C)**.

## TORTS

- ☐ Adult Survivors Act
- ☐ Asbestos
- ☐ Environmental (*specify*): \_\_\_\_\_
- ☐ Medical, Dental or Podiatric Malpractice
- ☐ Motor Vehicle
- ☒ Products Liability (*specify*): OBO Minor
- ☐ Other Negligence (*specify*): \_\_\_\_\_
- ☐ Other Professional Malpractice (*specify*): \_\_\_\_\_
- ☐ Other Tort (*specify*): \_\_\_\_\_

## SPECIAL PROCEEDINGS

- ☐ Child-Parent Security Act (*specify*): ☐ Assisted Reproduction ☐ Surrogacy Agreement
- ☐ CPLR Article 75 - Arbitration [see **NOTE** in **COMMERCIAL** section]
- ☐ CPLR Article 78 - Proceeding against a Body or Officer
- ☐ Election Law
- ☐ Extreme Risk Protection Order
- ☐ MHL Article 9.60 - Kendra's Law
- ☐ MHL Article 10 - Sex Offender Confinement (*specify*): ☐ Initial ☐ Review
- ☐ MHL Article 81 (Guardianship)
- ☐ Other Mental Hygiene (*specify*): \_\_\_\_\_
- ☐ Other Special Proceeding (*specify*): \_\_\_\_\_

## MATRIMONIAL

- ☐ Contested
- NOTE:** If there are children under the age of 18, complete and attach the **MATRIMONIAL RJI Addendum (UCS-840M)**.
- For Uncontested Matrimonial actions, use the Uncontested Divorce RJI (UD-13).*

*For Uncontested Matrimonial actions, use the Uncontested Divorce RII (UD-13).*

**REAL PROPERTY** Specify how many properties the application includes:

- ☐ Condemnation
- ☐ Mortgage Foreclosure (*specify*): ☐ Residential ☐ Commercial

Property Address: \_\_\_\_\_

**NOTE:** For Mortgage Foreclosure actions involving a one to four-family, owner-occupied residential property or owner-occupied condominium, complete and attach the **FORECLOSURE RII ADDENDUM (UCS-840F)**.

- ☐ Partition
- NOTE:** Complete and attach the **PARTITION RJ1 ADDENDUM (UCS-840P)**.
- ☐ Tax Certiorari (specify): Section: \_\_\_\_\_ Block: \_\_\_\_\_ Lot: \_\_\_\_\_
- ☐ Tax Foreclosure
- ☐ Other Real Property (specify): \_\_\_\_\_

## OTHER MATTERS

- ☐ Certificate of Incorporation/Dissolution [see **NOTE** in **COMMERCIAL** section]
- ☐ Emergency Medical Treatment
- ☐ Habeas Corpus
- ☐ Local Court Appeal
- ☐ Mechanic's Lien
- ☐ Name Change/Sex Designation Change
- ☐ Pistol Permit Revocation Hearing
- ☐ Sale or Finance of Religious/Not-for-Profit Property
- ☐ Other (specify):

STATUS OF ACTION OR PROCEEDING		Answer YES or NO for every question and enter additional information where indicated.
1	2	3
4	5	6
7	8	9
10	11	12
13	14	15
16	17	18
19	20	21
22	23	24
25	26	27
28	29	30
31	32	33
34	35	36
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	YES	NO
1. Do you have a current driver's license?		
2. Do you have a current vehicle registration?		
3. Do you have a current insurance policy?		
4. Do you have a current safety inspection?		
5. Do you have a current title?		
6. Do you have a current license plate?		
7. Do you have a current vehicle identification number (VIN)?		
8. Do you have a current vehicle history report?		
9. Do you have a current vehicle maintenance record?		
10. Do you have a current vehicle accident history?		
11. Do you have a current vehicle recall status?		
12. Do you have a current vehicle theft status?		
13. Do you have a current vehicle lien status?		
14. Do you have a current vehicle title status?		
15. Do you have a current vehicle license status?		
16. Do you have a current vehicle insurance status?		
17. Do you have a current vehicle safety inspection status?		
18. Do you have a current vehicle title status?		
19. Do you have a current vehicle license plate status?		
20. Do you have a current vehicle identification number (VIN) status?		
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22. Do you have a current vehicle maintenance record status?		
23. Do you have a current vehicle accident history status?		
24. Do you have a current vehicle recall status?		
25. Do you have a current vehicle theft status?		
26. Do you have a current vehicle lien status?		
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28. Do you have a current vehicle license status?		
29. Do you have a current vehicle insurance status?		
30. Do you have a current vehicle safety inspection status?		

Has a summons and complaint or summons with notice been filed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	If yes, date filed: _____
Has a summons and complaint or summons with notice been served?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	If yes, date served: _____
Is this action/proceeding being filed post-judgment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	If yes, judgment date: _____

**NATURE OF JUDICIAL INTERVENTION** Check one box only and enter additional information where indicated.

- |   |                    |       |                    |
|---|--------------------|-------|--------------------|
| <input type="checkbox"/> Infant's Compromise                                    |                    |       |                    |
| <input type="checkbox"/> Extreme Risk Protection Order Application              |                    |       |                    |
| <input type="checkbox"/> Note of Issue/Certificate of Readiness                 |                    |       |                    |
| <input type="checkbox"/> Notice of Medical, Dental or Podiatric Malpractice     | Date Issue Joined: | _____ |                    |
| <input type="checkbox"/> Notice of Motion                                       | Relief Requested:  | _____ | Return Date: _____ |
| <input type="checkbox"/> Notice of Petition                                     | Relief Requested:  | _____ | Return Date: _____ |
| <input type="checkbox"/> Order to Show Cause                                    | Relief Requested:  | _____ | Return Date: _____ |
| <input type="checkbox"/> Other Ex Parte Application                             | Relief Requested:  | _____ |                    |
| <input type="checkbox"/> Partition Settlement Conference                        |                    |       |                    |
| <input type="checkbox"/> Poor Person Application                                |                    |       |                    |
| <input type="checkbox"/> Request for Preliminary Conference                     |                    |       |                    |
| <input type="checkbox"/> Residential Mortgage Foreclosure Settlement Conference |                    |       |                    |
| <input type="checkbox"/> Writ of Habeas Corpus                                  |                    |       |                    |
| <input checked="" type="checkbox"/> Other ( <i>specify</i> ):                   | TRO                |       |                    |

CI2023-07013

SES

List any related actions. For Matrimonial cases, list any related criminal or Family Court cases. If none, leave blank. If additional space is required, complete and attach the **RJI Addendum (UCS-840A)**.

Index #: EF2023-0220

Case Title	Index/Case Number	Court	Judge (if assigned)	Relationship to instant case

PARTIES

For parties without an attorney, check the "Un-Rep" box and enter the party's address, phone number and email in the space provided. If additional space is required, complete and attach the **RJI Addendum (UCS-840A)**.

Un-Rep	Parties	Attorneys and Unrepresented Litigants	Issue Joined	Insurance Carriers
<input type="checkbox"/>	Name: Lama, Luciano J. Role(s): Plaintiff/Petitioner	LUCIANO LAMA, THE LAMA LAW FIRM, LLP, 2343 N. TRIPHAMMER RD. , ITHACA, NY 14850, 607-275-3425, ciano@lamalaw.com	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
<input checked="" type="checkbox"/>	Name: Meta Platforms, Inc. Role(s): Defendant/Respondent	770 Broadway, New York, NY 10003	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
<input checked="" type="checkbox"/>	Name: Instagram, Inc. Role(s): Defendant/Respondent	770 Broadway, New York, NY 10003	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
<input type="checkbox"/>	Name: Role(s):		<input type="checkbox"/> YES <input type="checkbox"/> NO	
<input type="checkbox"/>	Name: Role(s):		<input type="checkbox"/> YES <input type="checkbox"/> NO	
<input type="checkbox"/>	Name: Role(s):		<input type="checkbox"/> YES <input type="checkbox"/> NO	
<input type="checkbox"/>	Name: Role(s):		<input type="checkbox"/> YES <input type="checkbox"/> NO	
<input type="checkbox"/>	Name: Role(s):		<input type="checkbox"/> YES <input type="checkbox"/> NO	
<input type="checkbox"/>	Name: Role(s):		<input type="checkbox"/> YES <input type="checkbox"/> NO	

I AFFIRM UNDER THE PENALTY OF PERJURY THAT, UPON INFORMATION AND BELIEF, THERE ARE NO OTHER RELATED ACTIONS OR PROCEEDINGS, EXCEPT AS NOTED ABOVE, NOR HAS A REQUEST FOR JUDICIAL INTERVENTION BEEN PREVIOUSLY FILED IN THIS ACTION OR PROCEEDING.

Dated: 04/05/2023

3033073

Attorney Registration Number

LUCIANO J LAMA

Signature

LUCIANO J LAMA

Print Name

CI2023-07064

**Tompkins Supreme and County Courts**

320 North Tioga Street

Ithaca, NY 14850

(607) 216-6610 Phone (212) 401-9071 Fax

Index # : EF2023-0220

Rebecca Jackson  
Chief Clerk

April 6, 2023

Luciano Joseph Lama , Esq.  
THE LAMA LAW FIRM, LLP  
2343 N Triphammer Rd  
Ithaca , NY 14850-1092

---

Luciano J Lama

-against-

Meta Platforms, Inc., Instagram, Inc.

**JUDICIAL ASSIGNMENT NOTICE****Index No.:** EF2023-0220**RJI Date:** 04/05/2023

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**Case Type:** Tort-Products Liability : OBO Minor

A request for judicial intervention has been filed in the above-referenced action.

The nature of judicial intervention is: **Order to Show Cause** .

In accordance with directive of the Chief Administrative Judge, this case has been assigned to:

**Honorable Mark G. Masler**  
**320 North Tioga Street**  
**Ithaca, NY 14850**

Sincerely yours,

Rebecca Jackson  
Chief Clerk\*\*Please refer to the Sixth Judicial District Rules which may be found at: <http://www.nycourts.gov/courts/6jd/rules.shtml>

CI2023-07226

STATE OF NEW YORK  
SUPREME COURT CHAMBERS

Index # : EF2023-0220

MARK G. MASLER  
JUSTICECORTLAND COUNTY COURTHOUSE  
46 GREENBUSH STREET  
CORTLAND, NEW YORK 13045-02772(607) 218-3340  
FAX (212) 520-6830  
CRTMasler\_Chambers@nycourts.govMICHAEL P. PORCIELLO, LAW CLERK  
SHERYL A. HOLBROOK, SECRETARY

April 7, 2023

Ciano J. Lama, Esq.  
The Lama Law Firm, LLP  
2343 North Triphammer Road  
Ithaca, New York 14850  
Via NYSCEFJennifer Newstead, Chief Legal Officer  
Natalie Naugle, Director and Assoc. General Counsel, Litigation  
Meta Platforms, Inc.  
181 Fremont Street  
San Francisco, California 94105  
Via USPS (without encl.) and email to  
[jnewstead@fb.com](mailto:jnewstead@fb.com)  
[nnaugle@fb.com](mailto:nnaugle@fb.com)**RE: Luciano J. Lama o/b/o L.D.L., an infant v**  
**Meta Platforms, Inc., and Instagram, Inc.**  
Tompkins County Index No. EF2023-0220

Dear Mr. Lama, Ms. Newstead, and Ms. Naugle:

An action has been commenced in Supreme Court, Tompkins County, against Meta Platforms, Inc., and Instagram, Inc., by Mr. Lama on behalf of a minor. Plaintiff seeks a temporary restraining order (TRO) directing defendants to remove a specified account from Instagram. Notice must be given of when an application for a TRO will be considered (*see* Uniform Rules for Trial Cts [22 NYCRR] § 202.8-e). Accordingly, you are notified that the application for the temporary restraining order will be heard on **April 18, 2023, at 4:00 p.m. (EDST)** by Microsoft Teams conference at the link shown below (which is also provided to you concurrently by email).

The court is aware that the initiatory papers have yet to be served on defendants. Following decision on the application for a TRO, the court will order that plaintiff properly serve defendant with the summons, complaint, and any other necessary documents (unless defendants agree to accept service). If plaintiff's request for a TRO is granted, the order will not be effective until it is served.



CI2023-07226

Index #: EF2023-0220

**Lama v Meta Platforms, Inc. et al.**

April 7, 2023

Page 2

Copies of the papers filed to date are provided herewith. You may access the complete file via the New York State Courts Electronic Filing System by searching for the above-referenced index number at <https://iapps.courts.state.ny.us/nyscef/>.

Very truly yours,

MGM

Digitally signed by Hon.  
Mark G. Masler  
DN: C=US, OU=Cortland  
County Supreme Court,  
O=Sixth Judicial District,  
CN=Hon. Mark G.  
Masler,  
E=crtmasler\_chambers  
@nycourts.gov  
Date: 2023.04.07  
10:18:38-04'00'

Hon. Mark G. Masler  
Supreme Court Justice

MGM:mpp

To obtain the link necessary to join by videoconferencing, please contact the court at 607-218-3340 or CRTMasler\_Chambers@nycourts.gov prior to the appearance date and the link will be emailed to you. You may join by telephone by dialing the number shown below and entering the Conference ID.

**Join Microsoft Teams Meeting**

+1 347-378-4143 United States, New York City (Toll)  
(833) 262-7886 United States (Toll-free)  
Conference ID: 857 110 581#

Additional information regarding participation in virtual court proceedings may be found at <http://nycourts.gov/appear>.

***PLEASE DO NOT ATTEMPT TO JOIN THE MEETING PRIOR TO YOUR SCHEDULED APPEARANCE.***